

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MOHAMMED THANI A.T. AL THANI,

Plaintiff,

vs.

ALAN J. HANKE, IOLO GLOBAL LLC, SIDNEY  
MILLS ROGERS III, LAURA ROMEO, AMY ROY-  
HAEGER, SUBGALLAGHER INVESTMENT TURST,  
SHERRY SIMS, AND JOHN DOES 1-100,

Defendant.

Case No. 1:20-CV-4765 (JPC)

**DECLARATION OF  
MICHAEL C. HEFTER IN  
SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY  
JUDGMENT**

I, Michael C. Hefter, do hereby declare:

1. I am an attorney duly licensed to practice law before the Courts of New York and am a partner in the law firm of Alston & Bird LLP, 90 Park Avenue, New York NY 10016. I am admitted to practice before this Court and am counsel for Plaintiff in the above-captioned action, and as such am fully familiar with the facts, circumstances, and proceedings herein. I submit this declaration in support of Plaintiff's Motion for Summary Judgment. I make this declaration on the basis of my own personal knowledge and a review of the relevant documents relating to this action.

2. Attached as **Exhibit 1** is a true and correct copy of the transcript of the deposition of Alan J. Hanke, dated October 5, 2023, filed here in excerpted form.

3. Attached as **Exhibit 2** is a true and correct copy of text message conversations between Alan J. Hanke and Sidney Mills Rogers, bearing Bates number AH\_094257.

4. Attached as **Exhibit 3** is a true and correct copy of a ledger kept by Sidney Mills Rogers bearing Bates number RSM-A00002.

5. Attached as **Exhibit 4** is a true and correct copy of the transcript of the deposition of Sherry Sims, dated August 25, 2022, filed here in excerpted form.

6. Attached as **Exhibit 5** is a true and correct copy of email communications between Sherry Sims and Alan J. Hanke, dated November 26, 2019.

7. Attached as **Exhibit 6** is a true and correct copy of the transcript of the deposition of Amy Roy-Haeger, dated February 9, 2023, filed here in excerpted form.

8. Attached as **Exhibit 7** is a true and correct copy of the transcript of the deposition of Amy Roy-Haeger, dated December 3, 2021, filed here in excerpted form.

9. Attached as **Exhibit 8** is a true and correct copy of text message conversations between Alan J. Hanke and Amy Roy-Haeger, bearing bates number AH\_094915.

10. Attached as **Exhibit 9** is a true and correct copy of the transcript of the deposition of Alan J. Hanke, dated October 4, 2023, filed here in excerpted form.

11. Attached as **Exhibit 10** is a true and correct copy of Whatsapp communications between Alan Hanke and Amy Roy-Haeger.

12. Attached as **Exhibit 11** is a true and correct copy of Whatsapp communications between Amy Roy-Haeger and Lance Baraker.

13. Attached as **Exhibit 12** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated March 25, 2020, bearing bates number PLF00000587.

14. Attached as **Exhibit 13** is a true and correct copy of text message communications between Alan Hanke and Samuel Miginnis, bearing bates number AH\_098153.

15. Attached as **Exhibit 14** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated February 25, 2019, bearing bates number PLF00000451.

16. Attached as **Exhibit 15** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated March 25, 2020, bearing bates number PLF00000575.

17. Attached as **Exhibit 16** is a true and correct copy of email communications between Samuel Migginis and Steven Papi, dated March 12, 2019, bearing bates number PLF00001252.

18. Attached as **Exhibit 17** is a true and correct copy of the Management and Deposit Agreement, dated March 12, 2019, bearing bates number PLF00000935.

19. Attached as **Exhibit 18** is a true and correct copy of the Escrow Agreement, dated March 8, 2019, bearing bates number PLF00001292.

20. Attached as **Exhibit 19** is a true and correct copy of a Citi Bank statement, dated March 26, 2019, bearing bates number PLF00000263.

21. Attached as **Exhibit 20** is a true and correct copy of the Financial Guarantee, dated April 4, 2019, bearing bates number HANKE00722.

22. Attached as **Exhibit 21** is a true and correct copy of email communications between Steven Papi and William Vincent, dated April 11, 2019, bearing bates number PLF00000194.

23. Attached as **Exhibit 22** is a true and correct copy of the Al Thani Transaction Accounting statement prepared by Alan Hanke.

24. Attached as **Exhibit 23** is a true and correct copy of email communications between Steven Papi and Alan J. Hanke, dated May 7, 2019, bearing bates number PLF00001940.

25. Attached as **Exhibit 24** is a true and correct copy of email communications between Alan J. Hanke and Samuel Miginnis, dated June 20, 2019, bearing bates number PLF00000890.

26. Attached as **Exhibit 25** is a true and correct copy of email communications between Steven Papi and William Vincent, dated December 21, 2019, bearing bates number PLF00000192.

27. Attached as **Exhibit 26** is a true and correct copy of email communications between Alan J. Hanke and Samuel Miginnis, dated July 22, 2019, bearing bates number PLF00000878.

28. Attached as **Exhibit 27** is a true and correct copy of a Financial Guarantee dated July 25, 2019, bearing bates number CTRL00000313.

29. Attached as **Exhibit 28** is a true and correct copy of the Second Addendum to the March MDA, bearing bates number PLF00001097.

30. Attached as **Exhibit 29** is a true and correct copy of email communications between Carl Brown and AMR, dated June 26, 2020.

31. Attached as **Exhibit 30** is a true and correct copy of email communications between Carl Brown and Alan J. Hanke, dated July 16, 2019.

32. Attached as **Exhibit 31** is a true and correct copy of email communications between Carl Brown and Alan J. Hanke, dated July 24, 2019.

33. Attached as **Exhibit 32** is a true and correct copy of email communications between Steven Papi and Alan J. Hanke, dated July 25, 2019, bearing bates number PLF00002109.

34. Attached as **Exhibit 33** is a true and correct copy of email communications between Alan J. Hanke and Steven Papi, dated July 26, 2019, bearing bates number PLF00002107.

35. Attached as **Exhibit 34** is a true and correct copy of the Management and Deposit Agreement, dated July 29, 2019, bearing bates number PLF00001099.

36. Attached as **Exhibit 35** is a true and correct of email communications between Steven Papi and Alan J. Hanke, dated August 19, 2019, bearing bates number PLF00001628.

37. Attached as **Exhibit 36** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated August 1, 2019, bearing bates number PLF00000828.

38. Attached as **Exhibit 37** is a true and correct copy of email communications between Steven Papi and Alan J. Hanke, dated August 6, 2019, bearing bates number PLF00001108.

39. Attached as **Exhibit 38** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated April 19, 2020, bearing bates number PLF00000530.

40. Attached as **Exhibit 39** is a true and correct copy of email communications between Alan J. Hanke and AMR, dated September 20, 2019.

41. Attached as **Exhibit 40** is a true and correct copy of email communications between Steven Papi and Alan J. Hanke, dated October 29, 2019, bearing bates number PLF00001121.

42. Attached as **Exhibit 41** is a true and correct copy of the Third Addendum to the March MDA, bearing bates number HANKE00757.

43. Attached as **Exhibit 42** is a true and correct copy of the Second Addendum to the March MDA, bearing bates number PLF00000543.

44. Attached as **Exhibit 43** is a true and correct copy of text communications, bearing bates number AH\_104586.

45. Attached as **Exhibit 44** is a true and correct copy of text communications, bearing bates number AH\_104609.

46. Attached as **Exhibit 45** is a true and correct copy of the Loan Agreement, dated March 28, 2019, bearing bates number CTRL00009673.

47. Attached as **Exhibit 46** is a true and correct copy of email communications between Yang T. Lee and Alan J. Hanke, dated April 17, 2019, bearing bates number AH\_003971.

48. Attached as **Exhibit 47** is a true and correct copy of email communications between Carl Brown and La Renaissance, dated July 4, 2019, bearing bates number CTRL00009654.

49. Attached as **Exhibit 48** is a true and correct copy of email communications between William Vincent and Steven Papi, dated November 14, 2019, bearing bates number PLF00000031.

50. Attached as **Exhibit 49** is a true and correct copy of text communications bearing bates number H\_095588.

51. Attached as **Exhibit 50** is a true and correct copy of email communications between AMR and Alan J. Hanke, dated November 21, 2019, bearing bates number AH\_005337.

52. Attached as **Exhibit 51** is a true and correct copy of text communications bearing bates number AH\_099110.

53. Attached as **Exhibit 52** is a true and correct copy of text communications bearing bates number AH\_096584.

54. Attached as **Exhibit 53** is a true and correct copy of email communications between Steven Papi and William Vincent, dated December 14, 2019.

55. Attached as **Exhibit 54** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated March 25, 2020, bearing bates number PLF00000572.

56. Attached as **Exhibit 55** is a true and correct copy of email communications between Alan J. Hanke and AMR, dated January 5, 2020.

57. Attached as **Exhibit 56** is a true and correct copy of email communications between AMR and Alan J. Hanke, dated June 22, 2020.

58. Attached as **Exhibit 57** is a true and correct copy of email communications between Steven Papi and William Vincent, dated January 18, 2020, bearing bates number PLF00000738.

59. Attached as **Exhibit 58** is a true and correct copy of email communications between Steven Papi and Samuel Miginnis, dated January 23, 2020, bearing bates number PLF00000730.

60. Attached as **Exhibit 59** is a true and correct copy of email communications between Samuel Miginnis and Steven Papi, dated March 25, 2020, bearing bates number PLF00000566.

61. Attached as **Exhibit 60** is a true and correct copy of email communications between Alan Hanke and AMR, dated February 18, 2020.

62. Attached as **Exhibit 61** is a true and correct copy of email communications between Samuel Miginnis and William Vincent, dated July 21, 2020, bearing bates number PLF00000524.

63. Attached as **Exhibit 62** is a true and correct copy of email communications between Alan Hanke and AMR, dated June 26, 2020.

64. Attached as **Exhibit 63** is a true and correct copy of a letter from Craig Hubner to Alan Hanke, dated 27 June, 2020.

65. Attached as **Exhibit 64** is a true and correct copy of email communications between Steven Papi and Mohamed Al Thani, dated March 5, 2020, bearing bates number PLF00001379.

66. Attached as **Exhibit 65** is a true and correct copy of the First Addendum to the March 3, 2019 MDA, bearing bates number PLF00000192.

67. Attached as **Exhibit 66** is a true and correct copy of the Demand Letter addressed to Alan J. Hanke, dated April 13, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 23, 2023  
New York, New York

/s/ Michael C. Hefter  
Michael C. Hefter